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August 4, 2004

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: Southern Union Company, D.T.E. 04-__


Dear Ms. Cottrell:

Enclosed is the petition of Southern Union Company (the "Company") for authorization and approval by the Department of Telecommunications and Energy (the "Department") pursuant to G.L. c. 164, § 17A, to invest up to \$700 million in CCE Holdings, LLC, a joint venture between Southern Union and an equity partner, GE Commercial Finance Energy Financial Services. In support of the Company's petition, I have enclosed the prefiled testimony of David J. Kvapil, Executive Vice President and Chief Financial Officer, and exhibits thereto. Please find a check in the amount of \$100.00 to cover the filing fee for the Company's petition.

As detailed in Mr. Kvapil's testimony, the Company's transaction is subject to specific time constraints. Therefore, the Company respectfully requests that the Department issue a decision in this matter by August 23, 2004, or at least no later than the close of the bidding process on August 31, 2004.

Please do not hesitate to contact me if you I can provide you with any additional information concerning this matter.

Sincerely,



Cheryl M. Kimball

Enclosures

cc: John Cope-Flanagan, Hearing Officer (3 copies)

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Paul G. Afonso, General Counsel

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